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Richland Operations Office
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01-RCA-030

OCT 31 2000

Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Blvd., Suite Five
Richland, Washington 99352

Mr. Michael A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504

Addressees:

WASTE MANAGEMENT PROGRAM HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) CHANGE CONTROL FORM M-91-00-05 FOR TRI-PARTY AGREEMENT TARGET DATE M-091-11-T01

Enclosed for your approval is the signed Tri-Party Agreement Change Control Form, M-91-00-05, (Enclosure 1) which deletes Target Date M-91-11-T01 for a low-level mixed waste engineering study.

U.S. Department of Energy, Richland Operations Office (RL) looks forward to working with you and your staff to achieve the most cost effective Tri-Party Agreement compliance strategy that is in concert with Keith A. Klein's vision for the Transition of the Central Plateau.

If you have any questions, please contact me, or your staff may contact Ellen Dagan, Office of Regulatory Liaison, on (509) 376-3811.

Sincerely,

Clifford E. Clark, Acting Program Manager
Office of Regulatory Liaison

ORL:EBD

Enclosure:

cc: See page 2

cc w/encls:
L. Cusack, Ecology
F. Jamison, Ecology
R. F. Stanley, Ecology

cc w/o encls:
W. Burke, CTUIR
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J. D. Williams, FHI
P. Sobotta, NPT
M. L. Blazek, Oregon Energy
R. Jim, YN
Administrative Record

Change Number	Federal Facility Agreement and Consent Order Change Control Form	Date
M-91-00-05	Do not use blue ink. Type or print using black ink.	September 28, 2000

Originator
Helen E. Bilson

Phone
(509) 376-6628

Class of Change
[ ] I – Signatories [ ] II – Executive Manager [x] III - Project Manager

Change Title

Remove M-91-11-T01 Target Date for LLMW treatment facility Engineering Study/Functional Design Criteria Study.

Description/Justification of Change

This change removes M-91-11-T01 from the TPA. This target date identifies the need to complete and submit to the State of Washington Department of Ecology (Ecology) a LLMW treatment facility Engineering Study/Functional Design Criteria Study (FDC). When this target date was originally developed, the forecast of future waste streams was more substantial and the project was envisioned as a major construction project to design and build a new treatment/processing facility.

(Continued on page 2)

Impact of Change

This change request deletes this Target Date for LLMW treatment facility Engineering Study/Functional Design Criteria Study.

cted Documents

Hanford Federal Facility Agreement and Consent Order, DOE's Annual Land Disposal Restrictions Report to the extent TRUM is addressed; as amended, Hanford Site internal planning and budget documents (e.g., Agreement Action Plan, Appendix D, DOE and DOE contractor Baseline Change control documents, Multi Year Work Plans, Sitewide System Engineering control documents, Project Management Plans and the Hanford Site Integrated Priority List).

Approvals

DOE	10/31/2000 Date	X Approved ____ Disapproved
EPA N/A	Date	____ Approved ____ Disapproved
Ecology	Date	____ Approved ____ Disapproved

Reference: "Project Management Plan for Low-Level Mixed Waste and Greater-Than-Category 3 Waste per Tri-Party Agreement M-91-10", HNF-4293, May 1999.

The referenced Project Management Plan (PMP) delineates treatment and storage facility requirements for large container contact-handled (CH) low-level mixed waste (LLMW), remote-handled (RH) LLMW and Greater-Than-Category 3 (GTC3) waste not addressed by existing operable facilities such as the Waste Receiving and Processing (WRAP) facility.

The projected waste volumes of these waste streams have changed considerably since the development of the M-91 milestone language. The waste streams requiring storage and treatment and the proposed path forward for these streams are largely illustrated in Figure 3-3 of the referenced PMP. The path forward in Figure 3-3 can be summarized below.

Waste not requiring treatment in the "M-91 facility":

- 25,508-m3 long-length equipment will be treated in the tank farms by macroencapsulation and directly disposed of in a RCRA Subtitle C landfill, no additional treatment required.
- 1,750 m3 of low-activity melters will be treated at the vitrification facility by macroencapsulation and directly disposed of in a RCRA Subtitle C landfill, no additional treatment required.
- 1.3 m3 of GTC3 waste will be stored at CWC pending national disposal decisions, no treatment planned at this time.
- 18 m3 PCB transformer can be flushed and disposed, no additional treatment required, flush volume minimal (not included in Figure 3-3).
- 79 m3 of RH soil and gravel can be direct disposed (not included on Figure 3-3).

Waste requiring treatment in the "M-91 facility":

- 178 m3 of CH debris will be sorted and repacked, and then routed to commercial thermal treatment or macroencapsulation as appropriate.
- 61 m3 of RH debris in CH shielded containers in storage, plus an additional 3481 m3 of forecasted RH debris in shielded containers, will be treated by macroencapsulation.
- 57.1 m3 of forecasted RH homogeneous solids (RCRA metals) in CH shielded containers will be treated by macroencapsulation.
- 22.5 m3 of forecasted RH homogeneous solids (RCRA organics) in CH shielded containers will be treated by macroencapsulation.

As specified in the referenced PMP, the volume of waste that will actually require treatment in the "M-91 facility" is limited. Evaluation of this volume, processing rates, and treatment requirements led to the conclusion that an existing facility, the 2706-T Facility and its adjacent concrete pad, could be used to accomplish the required treatment operations.

Further evaluation of the proposed path forward since the issue of the PMP has also indicated that the required process operations and equipment requirements are: relatively simple and inexpensive; have been conducted at the T Plant Complex in the past; and do not warrant nor require the development of a Function Design Criteria cument (usually required for complex and expensive capital efforts).

Therefore, this Target Date is therefore no longer necessary.

Target Date Removed By This Modification

Strikeout indicates what will be deleted from the TPA.

Number	Description	Date
~~M-91-11-T01~~	~~**Complete and submit LLMW treatment facility/Engineering Study/Functional Design Criteria Study to Ecology.**~~ ~~The LLMW treatment facility Engineering Study/Functional Design Criteria Study will cover activities/facilities not considered commercially viable as documented in the approved LLMW/GTC3 PMP and associated Agreement change requests.~~	~~12/31/2000~~